

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

|  |   |                              |
|--|---|------------------------------|
| JEROME L. JOHNSON,                         | ) |                              |
|  | ) |                              |
| Plaintiff,                                 | ) | No. 1:19-cv-00698            |
|  | ) |                              |
| v.   | ) |                              |
|  | ) | Honorable Ellen L. Hollander |
| BALTIMORE POLICE DEPARTMENT, <i>et al.</i> | ) |                              |
|  | ) |                              |
| Defendants.                                | ) |                              |

**JOINT MOTION TO AMEND SCHEDULING ORDER**

Plaintiff Jerome L. Johnson (hereinafter “Plaintiff”), Defendants Kevin Davis, Frank Barlow, Daniel Boone, and Gerald Goldstein (hereinafter the “Officer Defendants”), and Defendant Baltimore Police Department (hereinafter the “BPD”), pursuant to Federal Rule of Civil Procedure 16(b)(4), submit this Joint Motion to Amend the Scheduling Order to (1) extend the deadline for responses to Requests for Admission and (2) defer Plaintiff’s depositions of Defendants’ experts and Defendants’ deposition of Plaintiff’s expert Rebecca Bowman-Rivas until after the Court has issued a ruling on summary judgment. In support thereof, the parties state as follows:

1. On September 23, 2021, Plaintiff disclosed three experts, including Rebecca Bowman-Rivas.
2. On October 14, 2021, Defendants disclosed five experts.
3. Plaintiff does not believe that it needs to depose Defendants’ experts in order to respond to any summary judgment motion filed by Defendants.
4. Depending on the Court’s ruling on summary judgment, not all of Defendants’ experts may be relevant for trial.

5. The parties have also agreed that Defendants may proceed with deposing Plaintiff's experts, except for Ms. Bowman-Rivas. Defendants do not believe that they need to depose Ms. Bowman-Rivas before filing for summary judgment. As in another recent matter pending in this District, the parties have come to this agreement and believe it to be an efficient course of action.

6. The parties have also agreed to an extension of the deadline for responses to the request for admissions, until November 21, 2021.

7. The parties agree that these changes do not affect the other deadlines in this case, including the deadline for filing dispositive pretrial motions.

8. The parties have thus agreed that within 14 days of the Court issuing its ruling on summary judgment, they will submit a proposed schedule for Plaintiff's depositions of Defendants' experts and Defendants' deposition of Ms. Bowman-Rivas, or they will make a joint request for a conference with the Court to set such a schedule. The parties have also agreed to an extension of the deadline for responding to requests for admissions.

9. The Court has not yet set a pretrial schedule in this case. Therefore, the parties' requests will not unnecessarily delay the progress of the case.

WHEREFORE, the undersigned parties jointly request that the Court modify the scheduling order in this case to allow for the modifications requested above and in the Proposed Order.

Dated: November 10, 2021

Respectfully submitted,

/s/

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/s/

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/s/

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**CERTIFICATE OF SERVICE**

I, the undersigned attorney, hereby certify that I have caused true and correct copies of the above and foregoing to be served on all counsel of record via the Court's CM/ECF system, in accordance with the rules of electronic filing of documents, on November 10, 2021.

Respectfully Submitted,

/s/  
Kobie A. Flowers